

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF OREGON

In re

NATHANIEL DAVID REIFENHEISER) Case No. **23-61441-tmr13**
JENNAFER GENTRY REIFENHEISER,) Confirmation Hearing Date: **10/31/23**
)
) **TRUSTEE'S OBJECTION TO**
) **CONFIRMATION AND MOTION**
Debtors.) **TO DISMISS**

Naliko Markel, Trustee, objects to confirmation of the Debtors' Chapter 13 Plan (ECF No. 2) for the reasons set out below:

- ☐ a. Plan is not feasible:
- ☐ b. Case not filed in good faith/Plan not proposed in good faith:
- ☒ c. Plan does not commit all of the Debtor's excess projected disposable income pursuant to 11 U.S.C. § 1325(b)(1)(B) for the applicable commitment period: **Schedule I should be amended to disclose the \$985 monthly rental contribution.**
- ☐ d. Plan does not meet the best interest test of 11 U.S.C. § 1325(a)(4):
- ☒ e. Filing/documentation is deficient: **Please provide: (1) copies of Debtors' Capital One #4785 and Discover Bank statements covering the date of filing (8/16/23); and (2) a tax calculation.**
- ☒ f. Other: **Plan change: (1) ¶15: strike "to pay all creditors secured by the subject property remaining in the Plan." And insert "to ensure plan remains feasible".**

Motion to Dismiss. For the above reasons, the Trustee moves the Court for an order dismissing this case.

I certify that on October 18, 2023, I served copies of the above Objection and Motion on the Debtor(s) and any debtor attorney.

DATED: October 18, 2023
(tm)

/s/ Andrea Breinholt, OSB #092975, for
Trustee